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54. The apparatus of claim 44, the conduits arranged in staggered rows.

REMARKS

The Office Action of August 7, 2002 has been carefully reviewed along with the prior art cited therein. Claims 1-32 are pending in the application. New Claims 33-54 are added. All of the Claims except Claims 11 and 24 were rejected under 35 U.S.C. §102(b) as anticipated by Bryant. Applicants are well aware of Bryant, having cited it in the application, and in no event does Bryant disclose the invention. Specification, p. 6, line 26 and following.

Bryant discloses a connection system for fluidly connecting shunt tubes between two screen units (or joints) 11a and 11b. Each screen unit 11 has a plurality of shunt tubes 14, each perforated 15 along their length for delivery of gravel slurry from the shunt tubes 14 to the well annulus. The problem addressed in Bryant is the connection of the shunt tubes 14 on one screen joint 11a to the shunt tubes on the adjacent screen joint 11b. Bryant discloses use of a sleeve assembly 30 which creates a manifold annulus 31 which fluidly connects the sets of shunt tubes without requiring that each shunt tube be connected with a separate connector to a corresponding shunt tube on the adjacent screen unit. See, for example, Figures 2 and 3; Abstract; Col. 3, line 20 – Col. 4, line 13; Col. 5, lines 10-19; Col. 6, line 17- Col. 7, line 12.

Applicants' invention does not attempt to provide a connector for connecting shunt tubes on adjacent screen units. In fact, one of the improvements of Applicants' invention is that it does not require the connection of shunt tubes on adjacent screen units. The invention, as claimed, requires that the shunt tubes be substantially blank, that is, substantially unperforated. Specification, p. 11, lines 11-25, for example. The delivery of slurry to the well annulus (cased or uncased) is accomplished through the open ends of the shunt tubes. Consequently, the shunt tubes do not extend the full length of the screen unit, because they are not intended to be directly connected (via a manifold or tube-to-tube connector) to corresponding shunt tubes on an adjacent screen unit. The shunt tubes of previous inventions extend the full length of the screen unit – in Bryant, the tubes extend from the connector manifold on one end of the screen unit to the connector manifold on the other end. The independent Claims require blank, or substantially blank, shunt tubes. Such tubes are not disclosed or taught in Bryant. The substantially blank tubes are not designed primarily to deliver slurry out of

perforations in the tube, but rather to provide a conduit from one end of the tube to the other for bypassing a sand bridge if one develops. In additional claims, the end of one tube is required to terminate at a different level than the ends of the other tubes. This is not taught in Bryant. Since the Bryant apparatus is designed to shuttle slurry from one end of the screen unit to the other, the tubes terminate at the same level as one another. The tubes are the same length, namely at least the distance from one connector manifold to the other. As to Claim 10, Bryant does not disclose tubes in spaced apart end-to-end relationship on a single screen unit. The spacing in Bryant is between tubes on adjacent screen units. Some of the Claim language has been amended to make more clear that the Claims are referring, where appropriate, to a single "screen unit." For these reasons the Claims are believed to be in condition for allowance and such action is respectfully requested.

If the examiner is of the opinion that a telephone conference would speed prosecution of the application, please do not hesitate to call Peter Schroeder at 214-220-0444.

Dated: January 24, 2003

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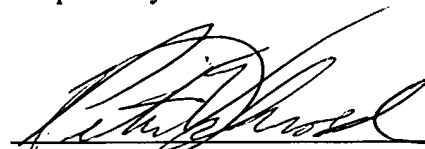
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